

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES )  
 OF CLIFF MANOR, INC., a Delaware corporation, ) Civil Action No. 04-910  
 INTEGRATED HEALTH SERVICES AT )  
 RIVERBEND, INC., a Delaware Corporation, )  
 INTEGRATED HEALTH SERVICES AT )  
 SOMERSET VALLEY, INC., A Delaware )  
 corporation, ALPINE MANOR, INC., a )  
 Pennsylvania corporation, INTEGRATED )  
 HEALTH GROUP, INC., a Pennsylvania )  
 corporation, SPRING CREEK OF IHS, INC., a )  
 Pennsylvania corporation, FIRELANDS OF IHS, )  
 INC., a Pennsylvania corporation, ELM CREEK )  
 OF IHS, INC., a Pennsylvania corporation, IHS )  
 LONG TERM CARE SERVICES, INC., a )  
 Delaware corporation, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 THCI COMPANY LLC, )  
 )  
 Defendant. )  
 )

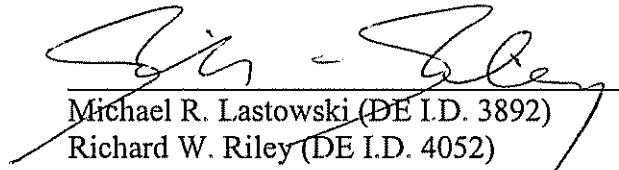
**PLAINTIFFS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT PURSUANT TO FED. R. CIV. P. 56**

The plaintiffs, and in particular, plaintiff IHS Long Term Care Services, Inc., by and through undersigned counsel, moves (the “Motion”) pursuant to Fed. R. Civ. P. 56, for an order granting partial summary judgment in favor of the plaintiffs and against the defendant. The Motion is based upon and supported by the Plaintiffs’ Memorandum of Law In Support of Motion for Partial Summary Judgment, Declaration of Amos Alter In Support of Partial Summary Judgment Motion and the exhibits attached thereto, all of which are being filed

contemporaneously herewith.

Dated: May 31, 2005  
Wilmington, Delaware

**DUANE MORRIS LLP**



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